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Attorney for Debtor

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**IN RE:**

**JAMES THOMPSON and  
DONNA THOMPSON**

**DEBTOR**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN PROCEEDINGS UNDER CHAPTER 13**

CASE NO. 12-17436/GMB

**NOTICE OF MOTION TO EXPUNGE  
PROOF OF CLAIM OF PSE&G AND TO  
RETRIEVE UNCLAIMED FUNDS  
DEPOSITED WITH THE CLERK OF THE  
COURT PURSUANT TO 11 USC §347(a)**

**Return Date: 3/19/2013**

**Time: 10:00AM**

**ORAL ARGUMENT REQUESTED**

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TO: Isabel C. Balboa, Chapter 13 Trustee  
Via CM/ECF

PSE&G

Attn: Bankruptcy Dept  
PO Box 490  
Cranford, NJ 07016

James Thompson  
45 Sweetfern Ct.  
Marlton, NJ 08053

Donna Thompson  
17 Boswell Rd.  
Marlton, NJ 08053

**PLEASE TAKE NOTICE** that the undersigned attorney for the debtors shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, 401 Market Street, Camden, New Jersey on the 19<sup>th</sup> day of March, 2013 at 10:00 AM or as soon thereafter as Counsel may be heard, for the entry of an Order Expunging the Proof of Claim of Public Service Electric & Gas Co. and to Retrieve Unclaimed Funds Deposited with the Clerk of the Court.

Movant shall rely on the annexed Certifications in support of the requested Order.

The within Motion requests to Expunge the Proof of Claim of Public Service Electric & Gas Co. and to Retrieve Unclaimed Funds Deposited with the Clerk of the Court.

As the facts and/or law the Debtors rely upon, as set forth in the accompanying Motion, and the basis for said Motion, do not present complicated or unique questions, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

WIZMUR & FINBERG, LLP  
Attorney for Debtors

Dated: February 14, 2013

/s/ Andrew B. Finberg  
ANDREW B. FINBERG, ESQ.